



---

**Re: Thread Wallets LLC v. Brixley Bags, LLC [IMAN-DMS1.FID2327228]**

---

**From** Brittany Frandsen <BFrandsen@WNLaw.com>

**Date** Mon 12/9/2024 2:02 PM

**To** Bud Todd <btodd@kba.law>; David P. Johnson <DJohnson@WNLaw.com>

**Cc** Chad Pehrson <cpehrson@kba.law>; Litigation Calendar <calendar@kba.law>

- EXTERNAL EMAIL -

Bud,

Acknowledging receipt of the deposition notices. We will check with Thread regarding deposition dates for most of these notices and get back to you. However, as noted in Thread's initial disclosures, Dillon Boyes is no longer employed by Thread, and we do not currently represent him. You may contact him directly to arrange for his deposition.

Thread would also like to schedule Ethan O'Connell's deposition, Brixley's 30(b)(6) deposition, and the last hour of Kimberly O'Connell's personal deposition during the week of January 13th. Please let us know if the O'Connells are available that week and what dates would be best. If possible, we would like to hold the last hour of Ms. O'Connell's personal deposition on the same day as Mr. O'Connell's personal deposition.

We expect to respond to your recent deficiency letter later today or tomorrow.

Thank you,

**Brittany Frandsen**

*Shareholder*

**WORKMAN NYDEGGER**

60 East South Temple, Suite 1000

Salt Lake City, UT 84111

Office Direct: (801) 321-8827

Email: [bfrandsen@wnlaw.com](mailto:bfrandsen@wnlaw.com)

---

**From:** Bud Todd <btodd@kba.law>

**Date:** Friday, December 6, 2024 at 9:20 PM

**To:** Brittany Frandsen <BFrandsen@WNLaw.com>, David P. Johnson <DJohnson@WNLaw.com>

**Cc:** Chad Pehrson <cpehrson@kba.law>, Litigation Calendar <calendar@kba.law>

**Subject:** RE: Thread Wallets LLC v. Brixley Bags, LLC

Brittany and David,

Attached, please see our response to your letter dated November 25, 2024. On November 25, You wrote to us acknowledging receipt of our letter dated November 22, 2024, and indicated that you were preparing a response to that letter. We wanted to follow up to see when we can expect a response to that letter.

Additionally, we have attached notices of deposition for Colby Bauer, McKenzie Bauer, Dillon Boyes, Logan England, Ryan King, and Trevor Reese. Please let us know if the dates in the notices work for you and your clients. If those dates and times do not work, please propose other times your clients would be available.

Thank you



Bryan (Bud) Todd

Associate

SALT LAKE CITY: 801.939.3698

btodd@kba.law

This e-mail message is intended only for the recipient(s) named above, and may contain privileged and/or confidential information. Please notify us immediately if you are not an intended recipient or its agent. Be aware that any unauthorized review, dissemination, or copying of this document is prohibited.

PRIVACY: This e-mail may contain information that is privileged or confidential. If you are not the intended recipient, please delete the e-mail and any attachments and notify the sender immediately, and do not use, copy, or disclose to anyone any of the contents hereof.